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d/b/a C4R Media Corp.*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

LORETTA WILLIAMS, individually and on  
behalf all others similarly situated,

Plaintiffs,

v.

WHAT IF HOLDINGS, LLC d/b/a C4R  
MEDIA CORP., and ACTIVEPROSPECT,  
INC.

Defendants.

Case No. 3:22-cv-3780-WHA

*Assigned to the Hon. William Alsup*

**STIPULATION TO EXTEND DEADLINE  
TO RESPOND TO CLASS ACTION  
COMPLAINT [L.R. 6-1(a)]**

Complaint Filed: June 27, 2022

Trial Date: None Set

Pursuant to Local Rule 6-1(a), Plaintiff Loretta Williams (“Plaintiff”) and Defendant What If Holdings, LLC (“Defendant”), by and through their respective counsel, stipulate as follows:

**RECITALS**

1. WHEREAS, on June 27, 2022, Plaintiff filed the *Class Action Complaint* against Defendant in this action. Dkt. 1.

2. WHEREAS, on July 18, 2022, Plaintiff filed a *Proof of Service* claiming service of the *Summons* and *Class Action Complaint* on July 1, 2022. Dkt. 16.

3. WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Defendant’s original deadline to respond to the *Class Action Complaint* was July 22, 2022.

4. WHEREAS, the parties conferred, and agreed to extend Defendant’s deadline to answer or otherwise respond to the *Class Action Complaint* by 38 days from July 22, 2022 to August 29, 2022.

5.. WHEREAS, the parties have conferred, and have agreed to extend Defendant’s deadline to answer or otherwise respond to the *Class Action Complaint* by an additional 14 days from August 29, 2022 to September 12, 2022.

6. WHEREAS, pursuant to Local Rule 6-1(a), no Court order is required to extend the time within which to answer or otherwise respond because the change will not alter the date of any event or deadline already fixed by Court order.

**STIPULATION**

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties, through their respective counsel, that Defendant’s deadline to answer or otherwise respond to the *Complaint* shall be extended 14 days from August 29, 2022 to September 12, 2022.

**IT IS SO STIPULATED.**

LOZEAU DRURY LLP

Dated: August 26, 2022

By /s/ Rebecca Davis  
REBECCA DAVIS

*Attorney for Plaintiffs*  
LORETTA WILLIAMS

SHEPPARD, MULLIN, RICHTER, & HAMPTON LLP

Dated: August 26, 2022

By /s/ Jay T. Ramsey  
JAY T. RAMSEY

*Attorneys for Defendant*  
WHAT IF HOLDINGS, LLC

**ATTORNEY'S E-FILING ATTESTATION**

As the attorney e-filing this document, and pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiff Loretta Williams whose electronic signature appears above has concurred in this filing.

August 26, 2022

/s/ Jay T. Ramsey  
Jay T. Ramsey

SMRH:4871-9325-0859.1